

Kevin S. Sinclair, NV Bar No. 12277
ksinclair@sinclairbraun.com
Alexander M. Kargher, NV Bar No. 16099
akargher@sinclairbraun.com
Samantha J. Aceves, NV Bar No. 16042
saceves@sinclairbraun.com
SINCLAIR BRAUN KARGHER LLP
15260 Ventura Blvd., Suite 715
Sherman Oaks, California 91403
Telephone: (213) 429-6100
Facsimile: (213) 429-6101

Attorneys for Defendant
NORTH AMERICAN TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE
PER L.R. IA 11-1(b)

Janet Trost, Esq.
501 S. Rancho Drive
Suite H-56
Las Vegas, Nevada 89106

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,
Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE
COMPANY,
Defendant.

Case No.: 2:21-cv-00415-KJD-VCF

**STIPULATION AND ORDER
CONTINUING DEADLINE TO REPLY
IN SUPPORT OF MOTION TO
DISMISS (ECF NO. 28) AND OPPOSE
COUNTERMOTION FOR PARTIAL
SUMMARY JUDGMENT (ECF NO. 32)**

(SECOND REQUEST)

COMES NOW defendant North American Title Insurance Company ("North American") and plaintiff Bank of America, N.A. ("BANA"), by and through their respective attorneys of record, hereby agree and stipulate as follows:

1. On March 17, 2023, North American filed its motion to dismiss BANA's complaint (ECF No. 28);

2. On March 31, 2023, BANA filed a response to North American's motion to dismiss and filed a countermotion for partial summary (ECF Nos. 31, 32);

3. On April 4, 2023, the Court granted the Parties' first stipulation to extend the

1 deadlines for North American to reply in support of its motion to dismiss and oppose BANA's
2 countermotion for partial summary judgment (ECF No. 34);

3 4. North American requests a thirty (30) day extension of its deadline to reply in
4 support of its motion to dismiss and to oppose BANA's countermotion for partial summary
5 judgment through and including Wednesday, June 7, 2023, to afford North American additional
6 time to respond to the legal arguments set forth in BANA's response and countermotion;

7 5. BANA does not oppose the requested extension;

8 6. This is the second request for an extension which is made in good faith and not for
9 purposes of delay;

10 **IT IS SO STIPULATED** that North American's deadline to reply in support of its motion
11 to dismiss and oppose BANA's countermotion for partial summary judgment is hereby extended
12 through and including June 7, 2023.

13 Dated: May 2, 2023

SINCLAIR BRAUN LLP

14 By: /s/-Kevin S. Sinclair

15 KEVIN S. SINCLAIR

Attorneys for Defendant

16 NORTH AMERICAN TITLE INSURANCE
COMPANY

17 Dated: May 2, 2023

WRIGHT FINLAY & ZAK, LLP

18 By: /s/-Lindsay D. Dragon

19 LINDSAY D. DRAGON

Attorneys for Plaintiff

20 BANK OF AMERICA, N.A.

21 **IT IS SO ORDERED.**

22 Dated this 3 day of May, 2023.

23 

24 KENT J. DAWSON

UNITED STATES DISTRICT JUDGE